SPECIALTY REVIEWS OF NADAS

1. Purpose:

This guide identifies when specialty reviews are required and the offices that will conduct them.

2. Situations Requiring Specialty Reviews:

Immediately after it has been determined that the NADA is acceptable for review, the primary reviewer should obtain the appropriate specialty reviews. The reviewer should see that the appropriate data and/or jacket are sent to the responsibleTeams within two working days after he/she receives it. An exception is the statistical evaluation of effectiveness and safety data, which should follow the initial effectiveness or safety review, to determine the validity of the applicant's statistical conclusions.

a. Antimicrobial Resistance:

It is required that the antimicrobial drugs for use for more than 14 days in feed for food animals meet the human and animal health safety criteria of 21 CFR 558.15. This evaluation is conducted in the Division of Therapeutic Drugs for Food Animals (HFV-130).

b. Human Food Safety:

If the drug is to be used in food-producing animals, the reviewer shall send the pertinent parts of the NADA to the appropriate specialty review Division for a determination relative to food safety.

(1) The following shall be sent to the Division of Human Food Safety (HFV-150):

(a) All data and summaries of data pertaining to the presence and identification of residues in edible tissues.

(b) Methods for the detection of these residues.

(c) Copies of the proposed labeling for the drug.

(2) The following shall be sent to the appropriate Team in the Division of Human Food Safety (HFV-150).

(a) All studies relating to the toxicity of the drug or its residues.

(b) Copies of the proposed labeling.

(c) Copy of the applicant's transmittal letter.

(d) Table of contents.

c. Chemistry (Manufacturing and Controls):

The reviewer in the Division of Manufacturing Technologies (HFV-140) has responsibility for evaluating the manufacturing, control, packaging and labeling operations of the new animal drug substance and the finished drug product, drug product stability, analytical methods for the raw materials and drug product, and the labeling of the product relative to its specifications.

d. Environmental Review:

(1) The pertinent sections of all NADAs shall be sent to the Environmental Assessment Team (HFV-145). There will be either a request for categorical exclusion, or an environmental assessment. The details of this review are found in the Policy and Procedures Guide 1240.2410.

(2) If the review concludes the environmental information is adequate, it would be accompanied by a statement of categorical exclusion, a Finding of No Significant Impact, or an Environmental Impact Statement. The applicant should be notified of the conclusion, and in the latter two instances, be provided with a copy of the document.

3. Statistical Review:

   a. Consulting statistical reviews are generally not intended as stand-alone reviews, but as supportive information to be integrated into the evaluation of animal safety, effectiveness, human food safety, etc. The primary reviewer or consulting reviewers remain responsible for the effectiveness or safety determination. The statisticians are available as consultants on specific statistical questions and aspects of these effectiveness or safety evaluations. Prior to submission to the statistician, generally it will be necessary for the reviewer to ensure that the parameters measured in the study are appropriate. The statistician should verify the statistical comments in any letter to the applicant.

   b. Any safety or efficacy study submitted in an NADA that has been evaluated statistically by the applicant and that has probability levels attached to its interpretation should be submitted to the BiometricsTeam (HFV-124) for review or discussion after the primary reviewer has determined that the study is otherwise acceptable. This is to ensure uniform NADE review of statistical data. An FOI summary containing probability levels attached to the interpretation of studies, in particular, is submitted for review and sign off.

4. The specialty review Team supplies a document summary of all aspects of the evaluation of the submission. The document summary contains a transmittal section addressing the adequacy of the information.

   a. If the specialty review concludes that data and information are complete, the review states this conclusion and provides a list of all points of incompletion in a "Transmit to the Applicant" section. The comments are transcribed electronically by the primary review Division and sent to the applicant.

   b. If the specialty review is a recommendation for approval, then the document summary contains the rationale for the approval recommendation, and any restrictions that are placed on the approval. As in Item 4.a., the comments are transcribed and sent to the applicant.

   c. The specialty review is read by the primary Division reviewer for obvious errors, relative to spelling, grammar, and syntax. If the corrections alter the review in any significant way, the change is concurred in by the specialty Team.

d. In the event aTeam receives a specialty review which contains a recommendation or statement with which the primary Division reviewer disagrees, informal methods using good management practices for resolving conflicts are employed first. A consensus is developed between the primary and review Divisions and the consensus transmittal is sent to the applicant. If a timely conclusion cannot be reached, the differences may be raised to the level of the Office Director. A record of the resolution of any significant controversies or differences of opinion is entered in the administrative file.